

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
) CC Docket No. 99-200
)
Number Resource Optimization)

**COMMENTS OF THE
OKLAHOMA CORPORATION COMMISSION
REGARDING
THE NATIONAL
THOUSANDS-BLOCK NUMBER POOLING ROLLOUT SCHEDULE**

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November 6, 2001

I. INTRODUCTION

In the above-captioned matter, the Federal Communications Commission (“FCC”) seeks comment on the proposed national thousands-block number pooling rollout schedule which was released October 17, 2001, in a Public Notice. The Oklahoma Corporation Commission (“OCC”) supports the FCC’s efforts in addressing number resource optimization. Specifically, the OCC supports moving to a national system for thousands-block number pooling while reserving the opportunity to implement a state pooling trial (pursuant to the terms of authority delegated to the OCC by the FCC on March 14, 2001) in NPAs that are not receiving timely relief through the national pooling process. The OCC understands the necessity for having area code relief plans in place and has adopted by order the plans submitted by the North American Numbering Plan Administrator (“NANPA”) on behalf of the Oklahoma Telecommunications Industry.¹

The OCC hereby respectfully submits these comments regarding the national rollout schedule. The OCC strongly supports the placement of the 918 NPA in the first quarter of the rollout, strongly requests that the 405 NPA be placed in an earlier quarter, and requests that the 580 NPA be placed in a group that will allow the OCC to complete pooling prior to any required area code relief.

¹ Oklahoma Corporation Commission; Cause No. PUD 200000597, Order No. 457525 (for the 405 NPA); Cause No. PUD 200000599, Order No. 457526, (for the 918 NPA).

II. DISCUSSION

A. 918 NPA

The OCC was informed on July 23, 2001 that a jeopardy situation existed in the 918 NPA which is in northeast Oklahoma and is inclusive of the Tulsa metropolitan area.² Prior to the 918 NPA jeopardy being declared, this NPA had an exhaust date of 4th quarter of 2002. OCC Staff was made aware of a sudden increase in demand for NXX codes in the 918 NPA prior to July 23 and began immediately investigating the source of that demand.³ The OCC Staff discovered that most of the increased demand for NXX codes was the result of a data provider who was receiving initial codes in ten thousand blocks in many rural central offices surrounding the Tulsa area in order to provide a complete service offering. Implementation of thousands-block national number pooling (combined with the OCC's efforts on rate center consolidation and other number conservation measures) will result in unused one thousand blocks being returned and subsequently allow many one thousand blocks that are stranded in the ten thousand block assignments of carriers to be reassigned within the existing rate center or within an expanded rate center following completion of rate center consolidation thus delaying costly area code overlays or area code splits.

The OCC strongly supports the placement of the 918 NPA in the 1st quarter of the national rollout. OCC Staff reiterates that the 918 NPA is in jeopardy and that thousands-block number pooling in conjunction with rate center consolidation and other number conservation

² According to the Industry Numbering Committee, Central Office Code (NXX) Assignment Guidelines, a jeopardy condition exists when the forecasted or actual demand for NXX resources will exceed the known supply in an area code before the end of the period required to plan and implement area code relief.

³ According to NANPA's "Code Assignment Activity For 2000" in the 918 NPA of Oklahoma, the average number of ten thousand block NXX codes assigned during the year 2000 was 3.9 codes per month. Staff's investigation showed that a spike in demand occurred starting in March (11 codes), April (14 codes), and May (25 codes). NANPA declared a jeopardy situation in the 918 NPA on July 23, 2001.

measures can relieve this jeopardy situation. Without this or similar relief, the residents of the Tulsa metropolitan area and rural areas in northeastern Oklahoma will unnecessarily be forced to adopt new dialing patterns which would impose considerable costs and burdens on businesses and residents in this area.

B. 405 NPA

OCC Staff is concerned that pooling for the 405 NPA which is in central Oklahoma and is inclusive of the entire Oklahoma City metropolitan area is being proposed for the 5th Quarter of the national rollout schedule. The 405 NPA has an exhaust date of 4th Quarter of 2002 according to NANPA estimates distributed on June 1, 2001. OCC Staff understands that the 5th Quarter of the rollout schedule will be sometime in mid-2003 which is several months after the current projected exhaust date for the 405 NPA. If this occurs an area code overlay or split will be required before any pooling trial begins. This could be prevented thus saving end-users unnecessary cost.

The OCC is compelled to request that the treatment afforded to 405 NPA be more in line with that given to 918 NPA. 405 NPA and 918 NPA had exhaust dates (prior to the 918 jeopardy being declared) that were in consecutive quarters. Under the proposed rollout schedule the pooling implementation dates are one year apart (918 NPA in the 1st Quarter of the rollout and 405 NPA in the 5th Quarter of the rollout). The facts described in the section above in the discussion of the 918 NPA wherein a provider was receiving ten thousand blocks in rural central offices to facilitate local provision of data services also apply to the 405 NPA. OCC Staff fully expects that this pressure on the numbering resources will cause the 405 NPA to move to a jeopardy situation in the next few months. When (and if) this happens, the 405 NPA will be in the same situation as the 918 NPA but there will be no timely relief available through

pooling in the national pooling system. In other words, area code relief in the form of a split or overlay would be required prior to an opportunity to implement national pooling in the 405 NPA. OCC Staff considers this disparate treatment of these similarly situated NPAs not to be in the public interest.

C. 580 NPA

OCC Staff considers the 580 NPA to have several years remaining before a number resource supply problem arises. The 580 NPA has a supply of 290 NXX codes and is assigning codes at a rate of about 2.9 NXX codes per month. This indicates a supply that could last several years. OCC Staff also notes that no geographical area in the 580 NPA is in the top 100 metropolitan statistical areas. The OCC requests that placement of the 580 NPA be made so that the OCC can implement thousands-block number pooling prior to required area code relief.

III. CONCLUSION

The OCC has an objective of minimizing the cost and confusion to Oklahoma telecommunications service consumers of permanent changes to dialing patterns (i.e. ten digit dialing for local calls) that are not caused by real growth in the demand for telecommunication services, but rather are being caused by the lawful actions of a few providers to provision services to a very few consumers. Oklahoma is a largely rural state which is experiencing very low rates of population growth.⁴ Measures, like ten digit dialing for local calls, needed in large metropolitan, high growth areas to assure that a supply of numbers is available to carriers in order to provide service should not be necessary in states like Oklahoma until real increase in demand for numbers occurs. The problem in Oklahoma is numbers stranded in the ten thousand

⁴ U.S. Bureau of the Census, "Projections of the Total Population of States: 1995 to 2025" (Series B). Estimated Oklahoma population in 1995 was 3,278,000 and was projected to increase to 3,370,000 in 2000 (an increase on an annual basis of under .6%), and is projected to increase to 3,471,000 in 2005 (an increase on an annual basis of .6%).

number block supplies of carriers. Implementation of thousands-block number pooling in the 918 and 405 NPAs at the earliest opportunity is crucial to the objectives of the OCC and the consumers of Oklahoma. The OCC repeats its support for the national pooling system, for the placement of the 918 NPA in the 1st Quarter, and repeats its appeal that the 405 NPA be afforded a slot in the national rollout schedule that will allow the OCC to realize the benefits of pooling relief before area code relief is required.

Respectfully Submitted,

THE OKLAHOMA CORPORATION COMMISSION

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